

Service Date: August 30, 2005

IN THE MATTER OF the Montana)	UTILITY DIVISION
Public Service Commission's)	
Implementation of)	DOCKET NO. N2005.8.124
Senate Bill 415, Renewable Energy)	
Standards for Public Utilities)	

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NOTICE OF OPPORTUNITY TO COMMENT,
NOTICE OF SCOPING MEETING

The 2005 Montana Legislature enacted Senate Bill 415 (SB 415) establishing standards for renewable resource attributes within regulated utilities' electricity supply portfolios. SB 415 requires the Commission to adopt rules by June 1, 2006 to: 1) select a renewable energy credit tracking system to verify compliance with SB 415; 2) establish a system for certifying eligible renewable resources; 3) define a process for granting waivers from full compliance with the standards; 4) define an advanced approval process for contracts between utilities and eligible renewable resources; and 5) establish requirements for renewable energy procurement plans and annual reports.¹

The Commission will involve the public heavily in its implementation activities. This notice includes a detailed analysis and interpretation of SB 415. It also describes possible implementation approaches and asks specific questions about these implementation approaches and related issues. The Commission requests written comments from interested persons by September 23, 2005. An original and ten (10) copies of written comments should be mailed to Kate Whitney, Utility Division Administrator, 1701 Prospect Avenue, P.O. Box 202601, Helena, Montana, 59620-2601.

The Commission will host a public scoping meeting on October 11, 2005, from 1:00 p.m. to 4:30 p.m. in the Bollinger Room at its offices in Helena. The scoping meeting will provide a forum for discussing the analysis, interpretation and possible implementation approaches included in this notice and any written comments the Commission receives.

¹ SB415.04, Section 6.

This notice and all written comments will be posted on the Commission's website: www.psc.mt.gov.

Analysis and interpretation of SB 415

Each year starting January 1, 2008, public utilities must comply with specific renewable energy standards (standards) designed to ensure that a certain percentage of the energy supplied to retail customers is produced by eligible renewable resources. Eligible renewable resources are resources that become commercially operational after January 1, 2005 and produce electricity from:

- Wind energy;
- solar energy;
- geothermal energy;
- hydroelectric energy through a facility with a nameplate capacity of 10 MW or less that does not require a new water appropriation, diversion or impoundment;
- landfill or farm-based methane gas;
- gas derived from treating wastewater;
- low-emission, nontoxic biomass²;
- hydrogen derived from any of the above energy sources used in fuel cells; and
- the fraction of energy produced by a multiple-fuel process that is derived from any of the above energy sources.

Eligible renewable resources must be located in, or deliver electricity to, Montana.

Starting in compliance year 2010, as part of the overall standards, utilities must acquire specific amounts of eligible renewable resource capacity developed locally by community renewable energy projects (CREPs). To qualify as a CREP, local owners including Montana residents, small businesses, non-profit organizations, tribal councils, political subdivisions or local governments, non-utility cooperatives, or combinations of these entities, must have a controlling interest in the eligible renewable resource(s). Individual CREPs are constrained to being no more than 5 megawatts total nameplate capacity. However, a single CREP may consist of several eligible renewable resources

² To qualify, the biomass must be based on dedicated energy crops, animal wastes or solid organic fuels from wood, forest, or field residues that have not been treated with chemical preservatives like creosote, pentachlorophenol or copper-chroma-arsenic.

dispersed throughout a circular 78.5 square mile area if the resources are constructed within the same 12 month period and are under common ownership.³ Utilities must purchase all electricity and renewable energy credits (RECs) associated with the CREP capacity standard.

Except for CREPs, SB 415 gives utilities several options for satisfying the standards. Ultimately, to comply, utilities must own (and retire) specific quantities of RECs. SB 415 defines a REC as “a tradable certificate of proof of 1 megawatt hour of electricity generated by an eligible renewable resource that is tracked and verified by the commission and includes all of the environmental attributes associated with that 1 megawatt hour unit of electricity production.” SB 415 requires utilities to conduct renewable energy solicitations to acquire RECs. Except for CREPs, utilities are free to purchase the electricity produced by eligible renewable resources along with the associated RECs, or just the RECs.⁴ Utilities can satisfy the non-CREP standards with any combination of RECs bundled with associated electricity purchases or RECs alone.⁵ SB 415 requires contracts for RECs of at least 10 years unless the Commission determines that shorter contracts will cost less long term.

SB 415 requires utilities to acquire specific quantities of RECs in each compliance year, determined as a percentage of metered retail energy sales of electrical energy in the previous year.⁶ Utilities have until April 1 of the next year to comply with the standards for a given compliance year. Each utility’s responsibility to acquire capacity from CREPs is a function of its share of total public utility retail sales of electrical energy in specific years. For example, based on 2004 data, NorthWestern Energy (NWE) and Montana-Dakota Utilities (MDU) have combined retail electrical energy sales of about 6,000,000 megawatt hours.⁷ NWE’s sales represent about 90%.

³ SB415.04, Section 3. The bill does not specify the circular 78.5 square mile area. However, the bill includes projects within 5 miles of a CREP in the definition of CREP total calculated nameplate capacity. This suggests that eligible projects within a 5 mile radius of a CREP can be included in the CREP, assuming the total nameplate capacity does not exceed 5 MW. Thus, the circular area which defines a CREP is $\pi 5^2$ or 78.5 square miles.

⁴ SB415.04, Section 5 (1) and 5 (2).

⁵ SB415.04, Section 4 (7).

⁶ SB415.04, Section 4 (5) requires that the portfolio standards be calculated based on delivered energy, after accounting for line losses.

⁷ MDU retail sales from its 2004 Annual Report. NWE default supply sales from the testimony and exhibits of Cheryl Hansen, Docket D2004.6.90.

SB 415 allocates the 50 MW total CREP capacity obligation in years 2010 through 2014 to individual utilities based on each utility's share of retail electrical energy sales in 2009. So if NWE's share of electrical energy sales remains 90%, for compliance years 2010 through 2014 NWE's community project purchase obligation would be 45 MW (50 MW x 90%) and MDU's would be 5 MW.

Table 1 summarizes the renewable energy standards in SB 415.

Table 1.

Compliance year	Individual utility REC obligations as a percentage of its retail energy sales	Total utility capacity acquisitions from community renewable energy projects
2008	5%	0 MW
2009	5%	0 MW
2010	10%	50 MW
2011	10%	50 MW
2012	10%	50 MW
2013	10%	50 MW
2014	10%	50 MW
2015+	15%	75 MW

Table 2 illustrates implementation of the renewable energy standards using NWE as an example, given its current resource portfolio and assuming actual retail sales match its 2004 default supply load forecast. As shown in Table 2, SB 415 allows utilities to acquire more RECs in a compliance year than are needed to satisfy the standard that year. Surplus RECs are banked. Utilities must use RECs banked in a compliance year in either of the two following compliance years. If a utility fails to satisfy the standard in a compliance year it is penalized \$10.00 per megawatt hour for the shortfall. However, the Commission may waive the obligation to fully comply with the standard in a compliance year if a utility demonstrates that, for reasons beyond its control, sufficient RECs could not be acquired despite reasonable efforts, or integrating additional renewable facilities into the electrical grid would jeopardize reliability.

Table 2.

Senate Bill 415 RPS Implementation - NorthWestern Energy Example

Year	NWE base case MWH consumption at meter (2004 DSP)	SB 415 RPS percentage	NWE RPS REC requirement	Judith Gap RECs @ 135 MW and 38% c.f.	NWE RPS REC account balance	SB 415 Community project requirement (MW)	NWE community project share (MW)	NWE community project MWH (36% c.f.)	Percent of total RPS requirement
2006	5,423,523	-	-	449,388	-	-	-	-	-
2007	5,444,822	-	-	449,388	-	-	-	-	-
2008	5,463,283	5%	272,241	449,388	177,147	-	-	-	-
2009	5,481,832	5%	273,164	449,388	353,371	-	-	-	-
2010	5,500,358	10%	548,183	449,388	396,488	50	45	141,912	26%
2011	5,520,054	10%	550,036	449,388	437,752	50	45	141,912	26%
2012	5,539,718	10%	552,005	449,388	477,046	50	45	141,912	26%
2013	5,559,446	10%	553,972	449,388	514,375	50	45	141,912	26%
2014	5,594,250	10%	555,945	449,388	549,730	50	45	141,912	26%
2015	5,651,015	15%	839,138	449,388	372,848	75	68	212,868	25%

To the extent a utility executes contracts with renewable resource project developers in order to comply with the portfolio standards, it must ensure that, for any projects constructed in Montana, all contractors give preference to Montana residents seeking employment related to the project if their qualifications are substantially equal to those of non residents. The utility also must ensure that all contractors pay standard prevailing wage rates for heavy construction, as provided in 18-2-401(13) (A), MCA.

SB 415 requires utilities to file renewable energy procurement plans with the Commission on or before specific dates. The Commission must establish the requirements for renewable energy procurement plans. Utilities currently submit either default supply plans (NWE) or integrated resource plans (MDU) to the Commission biennially. Table 3 shows the deadlines for filing renewable energy procurement plans, default supply plans and integrated resource plans.⁸

⁸ The deadlines for default supply plans and integrated resource plans are established by Commission rules. See ARM 38.5.8201-8227 and ARM 38.5.2001-2016.

Table 3.

Renewable energy procurement plans	NWE Default supply plans	MDU Integrated resource plans
January 1, 2007	December 2005	September 2005
June 1, 2008	December 2007	September 2007
	December 2009	September 2009
	December 2011	September 2011
June 1, 2013	December 2013	September 2013

SB 415 requires utilities to file reports with the Commission by March 1 each year demonstrating compliance with the previous year's portfolio standards. The Commission must define the format for these annual reports.

Finally, SB 415 excuses restructured utilities from purchasing electricity from an eligible renewable resource if the total cost of the electricity, including ancillary services, is the same or more than bids from other suppliers for an equivalent quantity of power over an equivalent contract term. Similarly, utilities that have not restructured are excused from purchasing electricity from an eligible renewable resource if the cost per kilowatt hour of the electricity is more than 15% greater than the cost of power from any available generating resource alternative. Importantly, as explained above, compliance with the standards depends on acquiring the requisite quantity of RECs, either bundled with electricity purchases or alone. Therefore, the cost caps do not allow a utility to avoid compliance with the standards, but could affect the method it uses to comply. For example, a utility may choose to acquire RECs alone to comply with the standards if the cost of the electricity, separated from the cost of RECs, from an eligible renewable resource proposed in Montana exceeds the cost cap. Coordinating language in SB 415 regarding implementation of Sections 4 and 7 suggests that the cost caps can excuse a utility's obligation to acquire capacity and energy from CREPs. It is not clear whether a utility still has a CREP REC purchase obligation if the cost of electricity from a CREP exceeds the cost cap.

Possible implementation approaches and questions for comment/discussion.

The first topic on which the Commission specifically requests comments is whether the above analysis and description of the various requirements in SB 415 is

accurate. A common understanding among parties of the requirements in SB 415, if possible, will facilitate Commission implementation of the bill.

Topic 1. Is the Commission's analysis and description of SB 415 and the associated utility and Commission obligations accurate? If not, in what specific ways is the description inaccurate and/or incomplete?

Certifying eligible renewable resources – Section 6 (2) (b)

Renewable energy procurement plans – Sections 5 (5) and 6 (2) (e)

The Commission must establish a system for certifying eligible renewable resources. Unlike the electricity supplier licensing process in § 69-8-404, MCA, the Commission need not broadly issue certificates, seals of approval or otherwise endorse generation projects as “eligible.” The Commission does not have sufficient resources or technical expertise to travel around the region physically inspecting facilities seeking an “eligible” designation; pre-certifying a pool of eligible renewable resources would necessarily depend on attestations of the resources themselves rather than any independent Commission verification of eligibility. Such a process is not specifically required in SB 415 and is not necessary. What is important is that RECs ultimately procured by utilities come from eligible facilities.

The most feasible way for the Commission to certify that utilities have acquired RECs from “eligible” renewable resources is through its regulation of utility procurement processes. For example, the competitive solicitation process could be designed so bids to supply RECs would have to demonstrate that the source of the RECs is an “eligible” renewable resource as defined in Montana law. Bidders that do not adequately demonstrate eligibility would not be considered. In turn, the Commission can assess utilities' compliance with and enforcement of competitive solicitation rules. With such a process the burden of demonstrating eligibility is placed on the resource owner (or the REC owner). The Commission's written responses to utilities' default supply plans and integrated resource plans could attest to the validity of the utility's process for acquiring REC's from eligible resources. To the extent a utility's compliance proposal is submitted for advanced approval, the contested case process and the resulting Commission order could also certify that the source of compliance is an eligible resource. The Commission

could also require annual reports filed by utilities to include personal attestations from company officers that the RECs come from eligible resources.

Finally, the whole idea behind regional tracking mechanisms, like WREGIS, is to verify renewable characteristics and deter duplicate sales of RECs in two or more states, important tasks that the Commission does not have the resources to accomplish. Mechanisms like WREGIS will be critical because SB 415 allows utilities to procure RECs from any source, not just directly from an owner of a physical resource; a utility could procure RECs from someone who knows nothing more than that they hold a certificate representing X MWh of renewable generation and that an entity like WREGIS stands behind its validity. Therefore, to the extent mechanisms like WREGIS define renewable resources in ways that match Montana's definition of eligible resources, the Commission could require that WREGIS certificates, for example, must be used to comply with SB 415 and that could constitute a system for certifying eligible resources.

The requirement that utilities submit renewable energy procurement plans could be incorporated into existing rules for default supply plans and integrated resource plans. Since compliance with the portfolio standards is a resource procurement activity, coordinating rules governing that activity with rules governing broader resource procurement activity seems reasonable. Furthermore, the Commission should be concerned that utilities develop strategies to comply with SB 415 that are cost effective and consistent with the other goals and objectives of default supply planning/integrated resource planning. Modifying existing default supply planning rules and integrated resource planning rules to reflect the renewable energy planning and procurement requirements in SB 415 should be relatively straightforward. Indeed, existing default supply and integrated resource planning rules already require consideration of the types of resources that SB 415 classifies eligible renewable resources.

Topic 2. Would additions to existing default supply planning and integrated resource planning rules, such as specific RFP requirements related to SB 415 compliance, along with Commission review and comment on the plans, advanced approval processes and regional tracking mechanisms like WREGIS provide an adequate system for certifying that REC's procured by utilities come from eligible

renewable resources? If not, how should the Commission certify that utilities procure RECs from eligible resources?

Topic 3. In what specific ways should existing default supply planning rules (ARM 38.5.8201-8227) and/or integrated resource planning rules (ARM 38.5.2001-2016) be modified to reflect SB 415?

Waiving full compliance with portfolio standards – Section 6 (2) (c)

The process for waiving full compliance with the renewable energy standards in SB 415 may be already sufficiently defined. SB 415 specifies conditions that would warrant granting a utility's request for a waiver. Utilities understand how to submit pleadings to the Commission. The Commission publicly notices receipt of petitions and provides an opportunity for interested parties to intervene, request a hearing and submit comments. The Commission reaches a decision based on arguments and evidence in the record. This process should be sufficient for processing utility requests for waivers under SB 415.

Topic 4. Are the Commission's existing administrative procedures sufficient to address requests by utilities that the Commission waive full compliance with the portfolio standards in SB 415? If not, how should the Commission modify its existing procedures?

Procedures for advanced approval of compliance actions – Section 6 (2) (d)

Similarly, the Commission has an established process for considering utility requests for advanced approval of proposed power purchase agreements, albeit for restructured utilities. The process is coordinated with utility resource plans and Commission comments on the plans, relies on competitive bidding, focuses on the reasonableness of price, term and quantity in a proposed contract and employs a contested process that allows stakeholder participation. That general process framework should be sufficient for evaluating requests by a utility for advanced approval of activities related to complying with SB 415.

Topic 5. Is the Commission's established process for evaluating default supply utility requests for advanced approval of proposed power purchase agreements sufficient for evaluating utility requests for advanced approval of proposed purchases of electricity and/or RECs to comply with SB 415? If not, in what specific ways should the Commission modify the existing process?

Establishing a format for annual reports – Section 5 (6)

The Commission currently requires utilities to report a large amount of information in standard, annual reports. Expanding the current annual reporting process to include uniform reporting requirements to track compliance with SB 415 would be a relatively simple task. The primary questions relate to what specific information should be reported and how it should be presented. A suggested annual report form, using NWE as an example, is included in this Notice as Attachment A.

Topic 6. Does the annual report form included as Attachment A provide sufficient information to verify compliance with the standards and is it logical and easy to understand? If not, in what specific ways should the Commission change the form?

Selecting a renewable energy credit tracking system – Section 6 (2) (a)

In June 2002, the Western Governors' Association (WGA) adopted a resolution supporting an independent regional tracking system to provide data that could be used to substantiate and track renewable energy generation. WGA sought to bring Western stakeholders together to help define the institutional structure, design operating guidelines and identify information needed to facilitate tracking and registering renewable energy generation.⁹ The California Legislature charged the California Energy Commission (CEC) with developing a tracking system to implement California's renewable portfolio standard. In October 2003, the CEC recommended that its staff work with the WGA to develop a regional certificates-based renewable energy tracking system. WGA and CEC are now working collaboratively to develop a West-wide renewable

⁹ The Montana Commission provided input on these issues through a WGA survey completed in the Spring of 2003.

tracking system called the Western Renewable Energy Generation Information System (WREGIS).

WREGIS is expected to be operational in early 2007. It will be an accounting system that tracks renewable energy generation, creates WREGIS certificates and accounts for transactions involving WREGIS certificates in the region covered by the Western Electricity Coordinating Council (WECC). WREGIS is intended to provide information regulators need to verify compliance with policies like Montana's SB 415. WREGIS certificates are RECs. Therefore, WREGIS certificates could form the basis for NWE's compliance with SB 415. WREGIS should allow the Commission to track the creation, transfer and retirement of WREGIS certificates throughout WECC to verify NWE's compliance. And the WREGIS accounting system would guard against double counting/double selling renewable energy attributes. The selection of WREGIS could be a reasonable way for the Commission to implement SB 415, Section 6 (2) (a).

Topic 7. Would WREGIS provide an adequate renewable energy credit tracking system to verify NWE's compliance with SB 415? If not, why and what alternative tracking system should the Commission select?

Since WREGIS is being designed, at least initially, to track renewable energy generation in the WECC footprint, it probably would not be an adequate tracking system to verify Montana-Dakota Utilities' compliance with SB 415. The National Council on Electricity Policy appears to be facilitating an effort to develop a Midwest renewable energy credit tracking system that ultimately could be used to verify MDU's compliance. However, this effort does not appear to be as far along as WREGIS and it is not clear whether a Midwest regional tracking system will be operational before 2008, the first compliance year in SB 415. In the absence of an established Midwest renewable energy tracking system, the Commission may need to develop its own system for verifying MDU's compliance with SB 415.

Topic 8. What is the current status of a Midwest regional renewable energy tracking system? If such a system is not operational by 2008, how should the Commission verify MDU's compliance?

Cost caps – Section 7

As explained in the analysis of SB 415, cost caps apply to *electricity* purchases from eligible renewable resources, not the cost of RECs, which represent environmental attributes and can be purchased separately from electricity produced by eligible renewable resources. Pursuant to SB 415, Sections 4 and 5, and CREPs aside, a utility's compliance with the standards depends on acquiring *RECs*. Therefore, although the cost caps could affect the viability of certain options for complying with the renewable energy standards, the cost caps do not allow utilities to avoid the obligation to procure the required RECs.

The cost caps may create an incentive for developers of eligible renewable resources to shift costs to RECs in order to reduce the likelihood of exceeding the electricity cost cap. Since the market for RECs is immature, the Commission may have to pay particular attention to ensuring that competitive bids related to SB 415 compliance accurately value electricity and RECs.

The cost cap that applies to NWE (a restructured utility) is not well defined and may impose apples-to-oranges cost comparisons. It is tied to bids that are not from eligible renewable resources but offer the same quantity of power over the same contract term. SB 415 does not specify whether the lowest of such bids would set the cost cap, or whether other characteristics of the bids should be considered in determining which bid(s) should be used to set the cost cap. The bill also does not specify how to set the cost cap if bids from other resources do not exactly match the quantity and contract term offered by eligible renewable resources.

Additionally, the cost cap that applies to NWE appears to be incomplete from an economics perspective; neither product type and quality nor the utility's resource needs are considered relevant to a comparison of alternative resources. If the Commission ignores product and quality differences between resources and the utility's portfolio needs when it sets cost caps for eligible renewable resources, inefficient resource decisions could result. As an example, an RFP could elicit one or more offers from non-renewable resources that exactly match a 75 MW, 10 year eligible renewable resource bid in terms of quantity, start date and end date. But if the non-renewable bid is for 75 MW off peak while the eligible renewable resource is expected to produce substantial energy

during peak periods, the two resources produce distinctly different products, which a utility may value differently based on market conditions and resource needs. In the example, if the renewable bid is \$37.00 per mwh, including ancillary service costs, and the non-renewable bid is \$34.00 per mwh, SB 415 would set the cost cap at \$34.00 per mwh and the renewable bid would exceed the cap, even though a cost comparison between these two different products does not make economic sense. If the utility were to decide not to procure the renewable resource because its price exceeded the SB 415 cost cap, it could be making an imprudent decision, depending on other alternatives for supplying its peak needs and the cost of RECs. In this example, the SB 415 cost cap for restructured utilities does not fit well with existing default supply portfolio planning statutes and Commission rules. Attachment B shows this scenario graphically.

Topic 9. Does SB 415 create an incentive for new eligible resource developers to shift costs to RECs for bid purposes and, if so, what, if anything, should the Commission do about it?

Topic 10. Does the Commission have any leeway to establish cost caps for restructured utilities such that product and quality differences and utility resource needs are considered in setting applicable cost caps?

Topic 11. If the cost of electricity from CREPs exceeds the cost cap, does a utility still have an obligation to purchase REC's from CREPs? If so how should the Commission determine the quantity that must be purchased?

With respect to the cost caps that apply to utilities that have not restructured, there could be questions about how to define/calculate the cost per kilowatt hour of eligible renewable resources and alternative generating resources available to the utility. The existing integrated resource planning process applied by the Commission to utilities that have not restructured relies on social costs when screening resources and selecting resource acquisition strategies. SB 415 does not define the term "cost per kilowatt hour" and it is not clear whether the 15% adder to the cost of an alternative resource is intended to capture external costs.

Topic 12. How should the Commission calculate the cost per kilowatt hour of eligible renewable resources and alternative resources for purposes of determining the cost cap for utilities that have not restructured?

Topic 13. Any other implementation issues the Commission should consider.

BY THE MONTANA PUBLIC SERVICE COMMISSION

GREG JERGESON, Chairman
BRAD MOLNAR, Vice-Chairman
DOUG MOOD, Commissioner
ROBERT H. RANEY, Commissioner
THOMAS J. SCHNEIDER, Commissioner

ATTACHMENT A, Page 1 of 2

Sch 34a	COMPLIANCE WITH RENEWABLE PORTFOLIO STANDARD		
	Compliance year:	2010	
	RECs procured in current compliance year	MWh	Percent of total
1	Eligible resources located in Montana		
2	Community projects	141,912	24%
3	Other RECs bundled with electricity purchases	449,388	76%
4	RECs purchased separately	0	0%
5	Subtotal	591,300	100%
6			
7	Eligible resources located outside Montana		
8	RECs bundled with electricity purchases	0	0%
9	RECs purchased separately	0	0%
10	Subtotal	0	0%
11			
12	Total RECs in current year	591,300	100%
13	REC compliance calculation	MWh	Percent
14	Metered retail sales in the previous year	5,481,832	
15	Total RECs procured in current year (from line 12)	591,300	
16	Prior compliance year banked RECs	353,371	
17	Total RECs available for current compliance year	944,671	17.2%
18	RECs from line 12 applied to current compliance year	194,812	
19	Banked RECs applied to current compliance year	353,371	
20	Total RECs applied to current compliance year	548,183	
21			
22	Required RECs	548,183	10.0%
23	Deficit RECs	0	
24	Penalty payment (line 23 x \$10.00/mwh)	\$0	
25	Current year surplus RECs	396,488	
26	Total banked RECs	396,488	
27	Community project compliance	MW/Mwh	Percent
28	Share of 2009 public utility retail sales in Montana		90.0%
29	Total required community project nameplate capacity	50	
30	Utility's required community project nameplate capacity	45	
21	Contracted community project capacity	45	
32	Total community project electricity/REC purchases	141,912	
33	Waivers from full compliance (if applicable)	Docket no.	Order no.
34	Waiver pursuant 69-8-XXX		

35	Waiver pursuant 69-8-XXX		
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Sch 34b	COMPLIANCE WITH RENEWABLE PORTFOLIO STANDARD		
	List sources of RECs procured in current compliance year by category		
1	Eligible resources located in Montana		
2	A. Bundled with electricity from an eligible resource		
3	Judith Gap power purchase agreement - 135 MW, 20 years		
4			
5			
6			
7			
8	B. Unbundled from electricity from an eligible resource		
9			
10			
11			
12			
13			
14			
15			
16	C. Community renewable energy projects		
17	Community project A, located XXX, 5 MW		
18	Community project B, located XXX, 5 MW		
19	Community project C, located XXX, 5 MW		
20	Community project D, located XXX, 5 MW		
21	Community project E, located XXX, 5 MW		
22	Community project F, located XXX, 5 MW		
23	Community project G, located XXX, 5 MW		
24	Community project H, located XXX, 5 MW		
25	Community project I, located XXX, 5 MW		
26			
27			
28			
29			
30	Eligible resources located outside Montana		
31	A. Bundled with electricity from an eligible resource		
32			
33			
34			
35			
36			
37			
38			
39			
40			
41	B. Unbundled from electricity from an eligible resource		
42			
43			
44			
45			

